

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**

DEMOND MOORE

Plaintiff

v.

NEXT GENERATION HOSPITALITY
LLC d/b/a Kings Inn and Suites,

Defendant

Case No. 1:22-cv-00548

NOTICE OF REMOVAL

TO: CLERK OF THE ABOVE-ENTITLED COURT

Please take notice that pursuant to 28 U.S.C. §1441 defendant Next Generation Hospitality LLC d/b/a Kings Inn Suites hereby removes to this Court the state court action described below.

1. On or about June 7, 2022 an action was commenced in Hamilton County Common Pleas Court entitled *Moore v. IHG, LLC*, Case No. A2202053.
2. On September 12, 2022, the matter was transferred to Warren County Common Pleas Court, and assigned case no. 22CV095465.
3. On September 20, 2022, Plaintiff filed a Notice of Dismissal of the claims against IHG, LLC and an Amended Complaint naming Next Generation Hospitality LLC as a defendant.
4. This Notice is timely under 28 U.S.C. § 1446(b)(1). Defendant Next Generation Hospitality LLC executed a waiver of summons on September 22, 2022.
5. A copy of all process, pleadings and orders served upon defendant in the state court action are attached hereto.
6. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §§ 1331 and 1343, and is one which may be removed to this Court by defendant pursuant to the

provisions of 28 U.S.C. §1441(a) in that it arises, in part, under the laws of the United States, specifically Title VII of the Civil Rights Act, 42 U.S.C. § 2000e *et seq.*

WHEREFORE, this action should be removed to the United States District Court for the Southern District of Ohio.

Respectfully submitted,

_____/s/ Joshua Engel
Joshua Adam Engel (0075769)
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been electronically served via Email this September 23, 2022 upon all counsel of record

_____/s/ Joshua Engel
Joshua Adam Engel (0075769)